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Application granted.

SO ORDERED.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

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October 27, 2022

Dated: New York, New York
October 28, 2022

VIA ECF

Honorable Naomi Reice Buchwald
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

**Re: Polcom USA LLC (“Polcom”) v. Affiliated FM Insurance Company
 (“AFM”), 1:20-cv-9206-NRB; M.A. Mortenson Company (“Mortenson”) v.
 Zurich American Insurance Company (“Zurich”), 1:22-cv-0092-NRB**

Dear Judge Buchwald:

Pursuant to the Parties’ Stipulated Confidentiality and Protective Order (Dkt. 63), Your Honor’s Individual Practices Rule 2(H), the Court’s standing order, 19-mc-00583, and the Court’s ECF Rules & Instructions, section 6, we write on behalf of AFM and respectfully move this Court for permission to file under seal, with Viewing Level Selected Parties, the declaration of Damon N. Vocke and exhibits in support of AFM’s Motion for Summary Judgment. Pursuant to the Confidentiality Order, AFM respectfully requests permission to file the proposed declaration and exhibits under seal because it describes and attaches documents designated by Zurich as “Confidential” under the Confidentiality Order. The proposed declaration and exhibits to be filed under seal will be filed electronically in accordance with Your Honor’s Individual Practices and the Court’s ECF Rules & Instructions, section 6, and contemporaneously with the filing, courtesy copies will be mailed to Chambers pursuant to Your Honor’s Individual Practices Rule 2(H).

AFM respectfully requests this Court grant it permission to file the proposed declaration and exhibits under seal as required by the Confidentiality Order.

Duane Morris

Honorable Naomi Reice Buchwald
October 27, 2022
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Very truly yours,

A handwritten signature in blue ink, appearing to read "Damon Vocke". The signature is fluid and cursive, with a large initial "D" and a stylized "Vocke".

Damon N. Vocke

DNV